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May 28, 2021

By ECF

Hon. Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

Re: Jamal Hammoud v. Société Générale de Banque au Liban (20 Civ. 00106 (MKV))

Dear Judge Vyskocil:

We represent the plaintiff Jamal Hammoud and have received today's Order from the Court regarding the briefing schedule. We write to respectfully request reconsideration of the Court's Order. As reflected in the pre-motion letter from defendant's counsel, the parties agreed upon a briefing schedule that had provided equal time for the parties to file their opening and opposing briefs: June 9 (opening brief) and July 14 (opposing brief), with the reply on July 29.

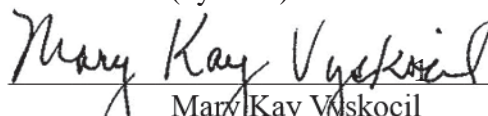
The Court's Order has had the effect of lengthening the defendant's time to make its motion to dismiss by a week (which has provided defendant with eight weeks from the April 22 filing of the amended complaint to make its motion) and cut back plaintiff's time to oppose by nearly two weeks, to July 2. Insofar as my co-counsel, Jacob Englander and I have other matters during the two weeks allotted by the Court (including an all-day mediation, oral argument before a FINRA panel and SEC testimony), Plaintiff respectfully requests an adjustment of the schedule to provide Plaintiff with 30 days (until July 18) in which to file its opposition. Defendant has no objection to the requested extension.

We thank the Court for its consideration of this request.

Plaintiff's request for an extension of several weeks to file its opposition brief is GRANTED. Defendant's motion is due June 18, 2021. Plaintiff's response is due July 19, 2021, as the date Plaintiff requested is a Sunday. Defendant's reply is due July 26, 2021. No further extensions of this briefing schedule will be granted absent extraordinary circumstances.

cc: ~~Defendant's Counsel (by ECF)~~

Date: June 14, 2021
New York, New York


Mary Kay Vyskocil
United States District Judge

Respectfully submitted,

/s/ Robert A. Giacovas

Robert A. Giacovas